

Exhibit 2

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SAMIAM GROUP, LLC

Plaintiff,

v.

COOPERSBURG ASSOCIATES, INC. dba
COOPERSBURG SPORTS

Defendant.

Case No. 22-cv-02256

**PLAINTIFF'S FIRST SET OF
REQUESTS FOR DOCUMENT
PRODUCTION**

To: Damon A. Neagle
Design IP, A Professional Corporation
1575 Pond Road, Suite 201
Allentown, PA 18104

Plaintiff, SAMIAM GROUP, LLC ("Samiam"), pursuant to Rule 34 of the Federal Rules of Civil Procedure, hereby propounds the following First Set of Requests for Document Production to Defendant COOPERSBURG ASSOCIATES, INC. dba COOPERSBURG SPORTS ("Coopersburg"), to be answered fully and separately in writing and under oath within 30 days after the service hereof or such other time that may be agreed upon by counsel.

INSTRUCTIONS

A. If defendant withholds any documents claiming that same are privileged, or subject to protection as trial preparation material, from any response requested by any of the following Requests, defendant shall identify or otherwise describe the nature of such documents, shall

REQUESTS FOR DOCUMENTS

1. All documents which in whole or in part refer or relate to the design, manufacture, purchase, shipping, marketing, offer for sale and sale of the Accused Product.
2. All documents which in whole or in part refer or relate to the revenues obtained by defendant from the sale of the Accused Product.
3. All documents which in whole or in part refer or relate to defendant's profits from the sale of the Accused Product, including any deductions from the revenues set forth in the documents produced in response to the previous Request, which defendant alleges are relevant to the calculation of said profits.
4. All documents which in whole or in part refer or relate to correspondence between defendant and any third party relating to the offer for sale and/or sale of the Accused Product, including but not limited to correspondence with potential customers and actual customers.
5. Separately, for each Defense set forth in Defendant's Answer, Affirmative Defenses and Counterclaim, all documents which in whole or in part refer, relate or support such Defense.
6. All documents which in whole or in part refer or relate to the basis for defendant's denial that the Accused Product infringes the Patent.
7. All documents which in whole or in part refer or relate to the basis for defendant's allegation that the Patent is invalid or unenforceable.

8. All documents which in whole or in part refer or relate to designs of drinking vessels, including baseball bat shaped drinking vessels.
9. All documents which in whole or in part refer or relate to the basis for defendant's denial that defendant's offer for sale and/or sale of the Accused Product is in violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law.
10. All documents which in whole or in part refer or relate to the basis for defendant's allegation that the Patent fails to meet one or more of the requirements of each or any of 35 U.S.C. §§ 101, 102, 103, 112 and/or 171.
11. All documents which in whole or in part refer or relate to plaintiff.
12. All documents which in whole or in part refer or relate to the Patent.
13. All documents which in whole or in part refer or relate to plaintiff's THE BEER BAT product.
14. Documents sufficient to establish defendant's current inventory of the Accused Product and the address where said inventory can be found.
15. All documents which in whole or in part support any of the Defenses or Counterclaim set forth in Defendant's Answer, Affirmative Defenses and Counterclaim.

August 10, 2022

//Robert L. Epstein//
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